

SCANNED

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SHEA DEVELOPMENT CORP., BRAVERA,
INC., and IP HOLDING OF NEVADA CORP.

07 cv 11201 (DLC)

-against-

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

CHRISTOPHER WATSON and
ELIZABETH ANNE CONLEY

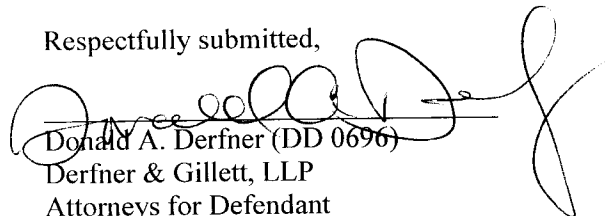
PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts of the
Southern and Eastern Districts of New York, I, Donald A. Derfner a member in good standing of
the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Allan R. Holmes
Gibbs & Holmes PC
171 Church Street, Suite 110
Charleston, SC 29402
(843) 722-0033 Telephone
(843) 722-0114 Fax

Allan R. Holmes is a member in good standing of the Bar of the State of South Carolina. He was
admitted to the Bar of the State of South Carolina, the Federal District Court of South Carolina,
and the U.S. Court of Appeals for the Fourth Circuit in 1973; the U.S. Court of Appeals for the
Federal Circuit in 1985; and the U.S. Supreme Court in 1981. He has been designated a Certified
Specialist in Labor and Employment Law by the Supreme Court, State of South Carolina.
There are no pending disciplinary proceedings against Allan R. Holmes in any State or Federal
court.

Dated: New York, New York
January 18, 2008

Respectfully submitted,



Donald A. Derfner (DD 0696)
Derfner & Gillett, LLP
Attorneys for Defendant
Elizabeth Anne Conley
600 Third Avenue, 26th Floor
New York, NY 10016
Tel. (212) 697-8100
Fax (212) 681-9122

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHEA DEVELOPMENT CORP., BRAVERA,
INC., and IP HOLDING OF NEVADA CORP.

07 cv 11201 (DLC)

-against-

CHRISTOPHER WATSON and
ELIZABETH ANNE CONLEY

**AFFIDAVIT OF
DONALD A. DERFNER
IN SUPPORT OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

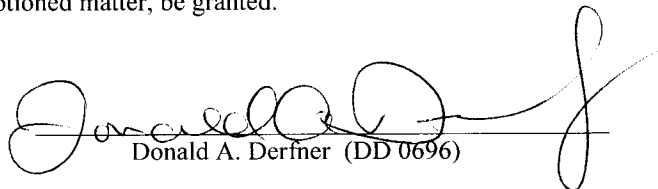
State of New York)
) ss:
County of New York)

Donald A. Derfner, being duly sworn, hereby deposes and says as follows:

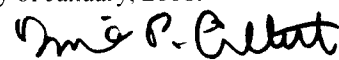
1. I am a member of Derfner & Gillett, LLP, counsel for Defendant Elizabeth Anne Conley in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant Elizabeth Anne Conley's motion to admit Allan R. Holmes as counsel pro hac vice to represent Defendant Elizabeth Anne Conley in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1969. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Allan R. Holmes, and worked with him on the captioned action, starting in December 2007.
4. Mr. Holmes is an attorney at Gibbs & Holmes PC, in Charleston, South Carolina.
5. I have found Mr. Holmes to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Allan R. Holmes, pro hac vice.
7. I submit a proposed order granting the admission of Allan R. Holmes, pro hac vice, which is attached hereto as Exhibit A. I annex a Certificate of Good Standing for Allan R. Holmes from the Supreme Court of South Carolina as Exhibit B.

WHEREFORE it is requested that the motion to admit Allan R. Holmes, pro hac vice, to represent Defendant Elizabeth Anne Conley in the above captioned matter, be granted.

Dated: New York, New York
January 18, 2008


Donald A. Derfner (DD 0696)

Sworn to before me this 18th
day of January, 2008.


Notary Public
David P. Gillett
Notary Public, State of New York
No. 02000000000000000000
Qualified in New York County
Commission Expires June 12, 2010

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHEA DEVELOPMENT CORP., BRAVERA, 07 cv 11201 (DLC)
INC.and IP HOLDING OF NEVADA CORP.

-against-

CHRISTOPHER WATSON and
ELIZABETH ANNE CONLEY

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of Donald A. Derfner, attorney for Elizabeth Anne Conley, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Allan R. Holmes
Gibbs & Holmes PC
171 Church Street, Suite 110
P.O. Box 938
Charleston, SC 29402
(843) 722-0033 Telephone
(843) 722-0114 Fax
aholmes@gibbs-holmes.com

is admitted to practice pro hac vice as counsel for Elizabeth Anne Conley in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: January ___, 2008

United States District/Magistrate Judge

The Supreme Court of South Carolina

Certificate of Good Standing

I, Daniel E. Shearouse, Clerk of the Supreme Court of South Carolina, do hereby certify that Allan R. Holmes was duly sworn and admitted as an attorney in this state on November 1, 1973, and is currently an active member of the South Carolina Bar.

DANIEL E. SHEAROUSE, CLERK

BY Gayle B. Watts
DEPUTY CLERK FOR BAR ADMISSIONS

Columbia, South Carolina

January 7, 2008

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHEA DEVELOPMENT CORP., BRAVERA,
INC., and IP HOLDING OF NEVADA CORP.,

Plaintiffs,

-against-

CHRISTOPHER WATSON and ELIZABETH
ANNE CONLEY,

Defendants.

07 CV 11201 (DLC)

Certificate of Service

David P. Gillett, an attorney duly admitted to practice in the United States

District Court for the Southern District of New York, certifies as follows:

On January 18, 2008, I served a copy of the annexed Notice of Motion for Admission

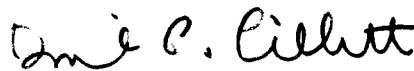
Pro Hac Vice and Supporting Affidavit upon:

Thomas V. Marino, Esq.
Counsel for Plaintiffs
Dunnington, Bartholow & Miller LLP
477 Madison Avenue, 12th Floor
New York, New York 10022

Jeffrey A. Simes, Esq.
Counsel for Defendant
Christopher Watson
Goodwin Procter LLP
599 Lexington Avenue
New York, New York 10022

by placing true and complete copies of same in properly addressed, first-class postage
paid envelopes and depositing them in an official repository of the U.S. Postal Service.

Dated: New York, New York
January 18, 2008



David P. Gillett (DG 5305)